

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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SCOTT TURNAGE, CORTEZ D. BROWN,	)	
DEONTAE TATE, JEREMY S. MELTON, ISSACCA	)	
POWELL, KEITH BURGESS, TRAVIS BOYD,	)	
TERRENCE DRAIN and KIMBERLY ALLEN	)	
on behalf of themselves and all similarly situated persons,	)	
	)	
Plaintiffs,	)	Civil Action No. 2:16-cv-02907-
	)	SHM-tmp
v.	)	
	)	Jury Demanded
BILL OLDHAM, in his individual capacity as former	)	
Sheriff of Shelby County, Tennessee; FLOYD BONNER,	)	
JR., in his official capacity as the Sheriff of Shelby County,	)	
Tennessee; ROBERT MOORE, in his individual capacity	)	
as former Jail Director of Shelby County, Tennessee;	)	
KIRK FIELDS, in his official capacity as the Jail Director	)	
of Shelby County, Tennessee; CHARLENE MCGHEE, in	)	
her individual capacity as former Assistant Chief of Jail	)	
Security of Shelby County, Tennessee; REGINALD	)	
HUBBARD, in his official capacity as Assistant Chief of	)	
Jail Security of Shelby County, Tennessee; DEBRA	)	
HAMMONS, in her individual capacity as former Assistant	)	
Chief of Jail Programs; TIFFANY WARD in her official	)	
capacity as the Assistant Chief of Jail Programs of Shelby	)	
County, Tennessee; SHELBY COUNTY, TENNESSEE,	)	
a Tennessee municipality; TYLER TECHNOLOGIES,	)	
INC., a foreign corporation; GLOBAL TEL*LINK	)	
CORPORATION, a foreign corporation; SOFTWARE	)	
AG USA, INC., a foreign corporation; SIERRA-CEDAR,	)	
INC., a foreign corporation; SIERRA SYSTEMS GROUP,	)	
INC., a foreign corporation, and TETRUS CORP, a foreign	)	
Corporation,	)	
	)	
Defendants.	)	

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**NOTICE TO TAKE THE DEPOSITION OF SCOTT TURNAGE**

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TO: **Scott Turnage**

c/o Frank L. Watson  
William F. Burns  
Watson Burns, PLLC  
253 Adams Avenue  
Memphis, TN 38104  
fwatson@watsonburns.com  
bburns@watsonburns.com

c/o Michael G. McLaren  
William E. Cochran, Jr.  
Brice M. Timmons  
Black McLaren Jones Ryland & Griffee PC  
530 Oak Court Drive, Suite 360  
Memphis, TN 38117  
MMcLaren@blackmclaw.com  
wcochran@blackmclaw.com  
btimmons@blackmclaw.com

Pursuant to Federal Rule of Civil Procedure 30(a)(1), Defendants Shelby County, Tennessee, Bill Oldham, Robert Moore, Charlene McGhee, Debra Hammons, Floyd Bonner, Jr., Kirk Fields, Reginald Hubbard, Tiffany Ward (collectively “Shelby County Defendants”), Tyler Technologies, Inc., Global Tel\*Link Corporation, Software AG USA, Inc., Sierra-Cedar, Inc., Sierra Systems Group, Inc., and Tetrus Corp. will take the deposition of **Scott Turnage via Zoom Video Conferencing on Tuesday, September 29, 2020 at 9:00 a.m. (CST)** and continuing until such time as completed. A link to the video conference will be provided to participating parties via email.

The testimony shall be recorded by a certified court reporter by stenographic, video, audio, electronic and/or other means. The deposition shall be taken before a notary public or other officer authorized by law to administer oaths.

The deposition is for class certification discovery. It may be used as evidence and for all other purposes authorized by law.

Respectfully submitted,

/s/ Meghan M. Cox  
Robert E. Craddock, Jr. (#5826)  
Odell Horton, Jr. (# 12426)  
Byron Brown (#23529)  
Meghan Cox (#33028)  
Wyatt Tarrant & Combs, LLP  
6070 Poplar Ave., Suite 300

Memphis, TN 38119  
(901) 537-1000  
rcraddock@wyattfirm.com  
ohorton@wyattfirm.com  
bbrown@wyattfirm.com  
mcox@wyattfirm.com

AND

E. Lee Whitwell (#33622)  
Shelby County Attorney's Office  
160 North Main Street, Suite 950  
Memphis, TN 38103  
(901) 222-2100  
lee.whitwell@shelbycountyn.gov

*Counsel for Defendants Shelby County, Tennessee,  
Bill Oldham, Robert Moore, Charlene McGhee,  
Debra Hammons, Floyd Bonner, Jr., Kirk Fields,  
Reginald Hubbard and Tiffany Ward*

**CERTIFICATE OF SERVICE**

I certify that the foregoing is being filed via the Court's ECF system this 28<sup>th</sup> day of September, 2020, for service on all persons registered in connection with this case, including:

Michael G. McLaren  
William E. Cochran, Jr.  
Brice M. Timmons  
Black McLaren Jones Ryland & Griffey PC  
530 Oak Court Drive, Suite 360  
Memphis, TN 38117  
MMcLaren@blackmclaw.com  
wcochran@blackmclaw.com  
btimmons@blackmclaw.com

Kevin David Bernstein  
Albert G. McLean  
Spicer Rudstrom PLLC  
119 S. Main Street, Suite 700  
Memphis, TN 38103  
kdb@spicerfirm.com  
amclean@spicerfirm.com

*Counsel for Defendant Sierra-Cedar, Inc.*

Frank L. Watson  
William F. Burns  
Watson Burns, PLLC  
253 Adams Avenue  
Memphis, TN 38104  
fwatson@watsonburns.com  
bburns@watsonburns.com

Douglas F. Halijan  
William David Irvine  
Burch Porter & Johnson  
130 N. Court Avenue  
Memphis, TN 38103-2217  
dhalijan@bpjlaw.com  
wirvine@bpjlaw.com

*Counsel for Plaintiffs*

*Counsel for Defendant Software AG  
USA, Inc.*

Bradley E. Trammell  
Baker, Donelson, Bearman, Caldwell &  
Berkowitz  
165 Madison Avenue, Suite 2000  
Memphis, TN 38103  
btrammell@bakerdonelson.com

Heather Gwinn-Pabon  
Erin McDaniel  
Gordon Rees Scully Mansukhani, LLP  
3401 Mallory Lane, Suite 120  
Franklin, TN 37067  
hgwinn@grsm.com

Beth Petronio  
K&L Gates  
1717 Main Street, Suite 2800  
Dallas, Texas 75201  
beth.petronio@klgates.com

*Counsel for Defendant Sierra Systems Group, Inc.*

*Counsel for Tyler Technologies, Inc.*

Russell Brandon Bundren  
James L. Murphy  
Bradley Arant Boult Cummings LLP  
1600 Division Street, Suite 700  
Nashville, TN 37203  
bbundren@babc.com  
jmurphy@bradley.com

/s/ Meghan M. Cox

*Counsel for Defendant Global TelLink  
Corporation*